

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

AJILON, LLC,

\*

Plaintiff/Counter-Defendant, \*

v.

\*

Civil Action No. WDQ-02-4075

SOFTSOL RESOURCES, INC.,

\*

Defendant/Counter-Plaintiff. \*

\* \* \* \* \*

**AJILON, LLC'S MOTION TO COMPEL CORPORATE DESIGNEE DEPOSITION**

Plaintiff/Counter-Defendant Ajilon, LLC, by its undersigned attorneys, pursuant to Local Rule 104.8 and Fed. R. Civ. P. 37(a), hereby moves to compel the corporate designee deposition of Defendant/Counter-Plaintiff Softsol Resources, Inc. The grounds for this motion, are set forth in the memorandum in support hereof.

\_\_\_\_\_  
/s/

Charles J. Morton, Jr.  
Federal Bar No. 8739  
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Attorneys for Plaintiff/Counter-Defendant  
Ajilon, LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 5<sup>th</sup> day of September, 2003, **Plaintiff/Counter-Defendant Ajilon, LLC's Motion to Compel Corporate Designee Deposition, Memorandum in Support thereof and proposed Order** were served electronically on:

Chirag V. Patel, Esquire  
Suite 300  
2225 Saint Paul Street  
Baltimore, Maryland 21218-5806

Attorney for Defendant/  
Counter-Plaintiff Softsol Resources, Inc.

\_\_\_\_\_/s/  
Daniel P. Moylan  
Federal Bar No. 024719

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